

EC Communication on "Simplifying for Sustainable Competitiveness"

CEPF Feedback

The Confederation of European Forest Owners (CEPF) welcomes the eighth environmental omnibus as a step to reduce compliance burdens while preserving environmental ambitions. European forest owners are natural allies in the green transition, but only if the regulatory framework supports rather than burdens them. The Communication references farmers and SMEs explicitly: forest owners deserve equal attention; and a cumulative impact assessment on their sector is long overdue.

On the EU Deforestation Regulation

CEPF noted with cautious satisfaction the 2025 legislative amendment reducing the EUDR's administrative burden and delaying implementation. Concerns about disproportionate due diligence obligations on operators in low-risk countries remain. CEPF calls for the April 2026 report to include targeted legislative amendments beyond what FAQs or guidance can address.

On the Nature Restoration Regulation

While CEPF appreciates the Commission's commitment to supporting Member States and the recognition of the needed active support for affected stakeholders, this falls short of addressing forest owners' concerns. A significant share of EU forests may be affected, yet financial implications remain unclear and there is no binding assurance that restoration on private land will remain voluntary. Fair compensation schemes and concrete financing instruments are therefore essential.

CEPF calls on the Commission to ensure that: restoration measures focus on existing Natura 2000 sites; a voluntary principle applies to private land; fair compensation where mandatory measures are imposed; meaningful flexibility for Member States; reduced reporting burdens under Article 12 (e.g. fewer indicators and extended intervals); and rigorous scrutiny of the methodology for determining Favourable Reference Values. Methods must be realistic, scientifically robust, and practically applicable, not based on idealised benchmarks that disadvantage actively managed forests.

On the Nature Directives

CEPF strongly welcomes the commitment to stress-test the Birds and Habitats Directives in 2026. While the Directives remain important, their implementation is no longer fit for purpose: expanding case law has created legal uncertainty discouraging long-term investment. Guidelines alone will not suffice, targeted legislative amendment must be part of the outcome. The stress-test should be guided by clear principles: respect for property rights and recognition of forestry's strategic economic, social and environmental role;

Case law has extended restrictions well beyond legislative intent: normal harvesting may now constitute "deliberate" disturbance of common bird species, and derogation for routine management is effectively unrealistic. Conservation status methodology compounds the problem: "one-out-all-out" aggregation against idealised threshold benchmarks systematically penalises sustainably managed forests.



CEPF calls on the Commission to conduct the stress-test with genuine openness to legislative reform, and to issue guidelines on FSC/PEFC certification compatibility; application of no-deterioration principle to managed forest as; and the permitting of adaptative management practices. Legal certainty is a prerequisite for the generational investment that forestry demands. and adaptive management for climate and wildfire resilience.

On the Circular Economy Act

The Circular Economy Act must not hinder the bioeconomy. CEPF firmly opposes any mandatory cascading principle for wood use: it is not universally applicable across forest product value chains, and its mandatory application would distort markets and undermine wood-based industries. Policy should incentivise resource efficiency without imposing prescriptive hierarchies.

Conclusion

The simplification agenda deserves full support. The stress-test of the Nature Directives and any subsequent legislative revisions, including of the Nature Restoration Regulation, must be oriented towards supporting forest owners as key actors in delivering the EU's environmental objectives. CEPF stands ready to contribute. Europe's forests will deliver on the green transition if the regulatory environment rewards rather than penalises sustainable management.